

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

INNOVATIVE SOLUTIONS  
INTERNATIONAL, INC., a Washington  
corporation,

Plaintiff,

v.

HOULIHAN TRADING CO., INC., a  
Florida corporation; BRIGHTON GROUP,  
LLC, an Arkansas limited liability company;  
MARCUS TECHNOLOGIES LLC, a Texas  
limited liability company; SHUMAKER  
INTERNATIONAL CORP., a Tennessee  
corporation; COOK INTERNATIONAL  
TRADE & BROKERAGE, INC., a Florida  
corporation; NORTH SOUTH FOODS  
GRP., INC., a Florida corporation;  
HENLEY'S WHOLESALE MEATS, INC.,  
an Arkansas corporation; PILGRIM'S  
PRIDE CORP., a Delaware corporation; and  
DOES 1–10,

Defendants.

Case No. 2:22-cv-00296-JCC

PARTIES' **AMENDED** DESIGNATED  
DEPOSITION TRANSCRIPTS

Innovative Solutions International, Inc., Houlihan Trading Co. Inc., and Pilgrim's Pride Corp. respectfully submit the attached amended designated deposition transcripts. The parties previously designated deposition transcripts on March 29, 2023 (Dkt. No. 261), before the trial date in this matter was continued. Trial is now scheduled for December 2, 2024. In light of the Court's rulings on the parties' motions in limine and subsequent conferrals between the parties regarding certain witnesses' attendance at trial, the parties are withdrawing certain deposition transcripts and amending certain transcripts, as indicated below. Overall, the volume of designations and objections thereto have been substantially reduced.

### **I. WITHDRAWN TRANSCRIPTS**

The parties withdraw the following deposition transcripts on the understanding that the listed witnesses will be available to testify in-person at trial:

<b>Witness</b>	<b>Previous Location</b>
<b>Alice Craft-McLaughlin (Fed. R. Civ. P. 30(b)(6))</b>	Dkt. No. 261, Ex. 1
<b>Alice Craft-McLaughlin</b>	Dkt. No. 261, Ex. 2
<b>Tanner Lipsey</b>	Dkt. No. 261, Ex. 7
<b>Santiago Tinoco</b>	Dkt. No. 261, Ex. 11
<b>Alana Wright</b>	Dkt. No. 261, Ex. 12

### **II. RESUBMITTED/AMENDED TRANSCRIPTS**

The parties resubmit the below deposition transcripts with amended designations, which supersede the parties' previously submitted deposition designations. The designated transcripts include all parties' designations, counter designations, objections, and responses to objections.

<b>Witness</b>	<b>Exhibit Number</b>
<b>Dan Cook (Fed. R. Civ. P. 30(b)(6))</b>	Ex. 1

Witness	Exhibit Number
<b>Bryan Griggs (Fed. R. Civ. P. 30(b)(6))</b>	Ex. 2
<b>Mike Henry (Fed. R. Civ. P. 30(b)(6))</b>	Ex. 3
<b>Cara Huntsman (Fed. R. Civ. P. 30(b)(6))</b>	Ex. 4
<b>Billy Marcus (Fed. R. Civ. P. 30(b)(6))</b>	Ex. 5
<b>Dolan Patterson</b>	Ex. 6
<b>Jacob Shumaker (Fed. R. Civ. P. 30(b)(6))</b>	Ex. 7
<b>Jason Larson (Fed. R. Civ. P. 30(b)(6))</b>	Ex. 8 - Being filed separately under seal pursuant to Court procedures; a slip sheet standing in for that filing is attached as Ex. 8

In the designations submitted with this filing, boxes on the right-hand side of the page indicate where a party has made an affirmative designation, a counter-designation, or has objected to a designation. Designations, counter-designations, and objections are indicated by a range showing Page:Line:Word. In cases where a party has objected to a designation, the basis for that party's objection is listed directly under the range showing the content objected to, and the responding party's response to the objection is directly below the objection. For example:

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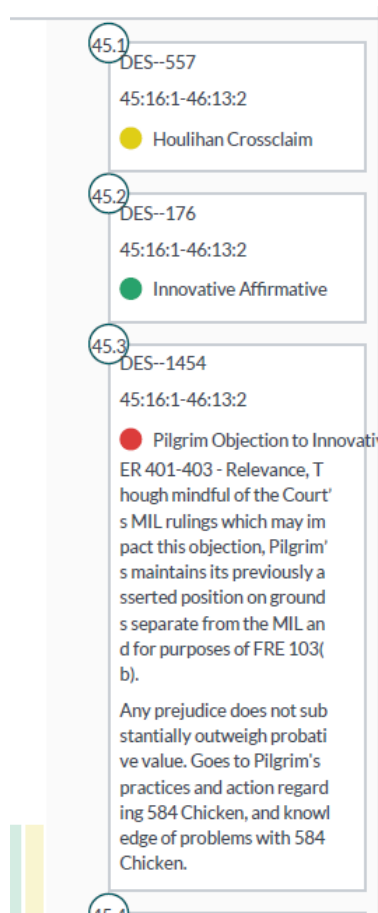
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The first box above shows a Houlihan crossclaim designation. The second box above shows an Innovative affirmative designation. The third box above shows a Pilgrim's objection to an Innovative designation. Each box shows the range of the testimony designated or objected to. Pilgrim's objection are the lines next to and directly below the red dot. Innovative's response to the objection is the language slightly below, beginning, "Any prejudice . . . ."

The unique "DES-NNN" identifiers in the boxes on the right-hand side of the transcripts are there to assist the parties, and the Court, if needed, in identifying particular designations, counter-designations, and objections. They do not otherwise have any significance.

1 Dated: October 25, 2024.

Respectfully Submitted,

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**CERTIFICATE OF SERVICE**

I, Elizabeth H. White, certify under penalty of perjury under the laws of the State of Washington that on October 25, 2024, I caused to be served a true and correct copy of the foregoing document on:

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DATED: October 25, 2024

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